Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Appropriate Framework for Broadband Access	)	
to the Internet over Wireline Facilities	)	CC Docket No. 02-33
	)	
Universal Service Obligations of Broadband	)	
Providers	)	CC Docket Nos. 95-20, 98-10
	)	
Computer III Further Remand Proceedings:	)	
Bell Operating Company Provision of	)	
Enhanced Services; 1998 Biennial Regulatory	)	
Review - Review of Computer II and ONA	)	
Safeguards and Requirements	)	

Comments of
TDS Telecommunications Corporation,
Madison River Communications and
North Pittsburgh Systems Inc.

TDS Telecommunications Corporation ("TDS Telecom")[1] and Madison River Communications ("Madison River")[2] and North Pittsburgh Systems Inc. (North Pittsburgh)[3], (hereinafter the "Joint Commenters"), hereby submit these comments in the above captioned proceeding.

[1] TDS Telecommunications Corporation owns and operates 106 rural ILECs with approximately 681,000 access lines in 28 states. Its CLEC subsidiaries, TDS Metrocom and USLink, provide service to over 220,000 access lines - both residential and business - in six states. The combined companies of TDS Telecom have over 11,000 DSL lines in service.

[2] Madison River Communications provides service to approximately 200,000 ILEC customers in four states. Its CLEC operates in four different states and through a mix of UNEs and limited direct builds, serves just under 20,000 lines.

[3] North Pittsburgh Systems Inc. provides service to approximately 79,000 ILEC access lines in Western Pennsylvania as North Pittsburgh Telephone Company. Its CLEC Penn Telecom Inc., operates in the Verizon and Sprint service areas of Western Pennsylvania and serves approximately 12,000 access lines through a combination of UNEs and limited direct builds.

Executive Summary

The Joint Commenters are carriers that through affiliated ILECs and CLECs are both suppliers and users of broadband UNEs and therefore their views provide a perspective on this issue like few others. The Joint Commenters have serious concerns with the FCC's proposed framework for the regulation of broadband access to the Internet over wireline facilities. The framework embodied in the Notice of Proposed Rulemaking[4] ("*Broadband NPRM*") will do little to encourage further broadband deployment by wireline carriers and will make it more difficult for small and rural carriers to upgrade facilities in rural and other underserved areas. Additionally, the proposed framework will stifle growing competition from alternative providers of broadband services to both business and residential consumers and impact the ability of competitive carriers to provide data services to businesses over wireline facilities that could be categorized as broadband facilities.

The *Broadband NPRM* starts out with admirable and largely uncontroversial goals. However, the proposed implementation of these goals is premised on the mistaken belief that it would be desirable, or even possible, to construct a regulatory system based on the services provided to the end user and not the facilities being used. A regulatory framework that attempts to apply differing levels of regulation for voice and broadband services carried over the same facilities is not practical, creates incentives for regulatory gaming and arbitrage and does little to promote additional deployment of broadband facilities.

[4] Notice of Proposed Rulemaking, *In the Matter of Appropriate Framework for Broadband Access to the Internet over Wireline Facilities*, CC 02-33, released February 15, 2002, ("*Broadband NPRM*").

It is the experience of the Joint Commenters that unbundling obligations do not impede the roll out of broadband, high costs and low utilization rates do, and that the threat of competition can help overcome these factors. While the FCC can do little to address demand issues, its current system of Title II regulation provides substantial benefits to small and rural carriers through the tariffing and pooling process. This system helps promote the deployment of broadband capable facilities in the rural and high cost areas most in need of assistance. At the same time, current Title II regulations improve the likelihood that competitive pressures will act to accelerate broadband deployment.

The Joint Commenters urge the Commission to carefully craft policies that encourage further wireline broadband competition, that create incentives for additional deployment in areas found to be lagging and that ensure the stability of the federal universal service fund by expanding, not limiting, the fund's contribution base. The best way for the Commission to accomplish these objectives is by continuing to classify the transmission component of wireline broadband services as telecommunications services regardless of who provides the Internet access component of the product to the end user.

I. Introduction

In the complex world of telecommunications regulation, cross-pollination of products and services has a subtle but extremely important effect on the players involved; it gives everyone a stake in multiple sides of the debate, thus moderating extreme policy positions. For example, even though ILECs may dislike providing unbundled elements at TELRIC rates, as they move outside of their own territory they are just as dependent on those UNEs for their own growth and competitive survival as any CLEC. Unfortunately,

while a few carriers, including the Joint Commenters, have done just as the 1996 Act envisioned, the largest carriers' forays outside of their traditional markets have been so limited that they have had an inconsequential effect on company earnings and therefore on company regulatory policy. Thus, one of the critical components of the system of checks and balances built into the 1996 Act has, in many cases, failed and caused a polarization of the debate on issues such as broadband deployment and, more generally, the provision of UNEs.

The Commission will receive comments from many parties in this proceeding. Unlike most of those parties, the Joint Commenters do not only have a stake in one side of the debate. Each company leases facilities to provide broadband services and must lease the same types of facilities to competitive carriers when asked to do so. Consequently, each member of the group has had to internally grapple with the implications of widely divergent policy positions and develop delicately balanced compromise stances. The unique perspective of the Joint Commenters should provide the Commission with an example of an approach to broadband policy that cuts through the harsh rhetoric that has surrounded the debate in this and related proceedings. Because the public interest is best served when balanced solutions are presented by parties with divergent views, the Joint Commenters feel that the Commission should give significant weight to the comments that follow.

The Telecommunications Act of 1996 had as one of its lofty goals the development of competition in all markets related to communications. Congress anticipated a frenzy of competition when it opened the floodgates with passage of the 1996 Act. CLECs entering the market to provide a full suite of communications services,

IXCs jumping into the local market to provide bundled packages and ILECs going head to head with each other outside of their traditional markets to provide one-stop shops for consumers. Their vision anticipated cable companies diving into voice services and LECs into video and that wireless and satellite carriers would provide even more choices. They assumed that market forces would motivate carriers to roll out an increasing variety of services.

The purpose of the discussion above was not to lecture the Commission on the intent of the 1996 Act. That is a topic with which it has more than enough experience. The purpose was to provide a bit of background for the Commission to understand how the Joint Commenters positions discussed below were developed. These policy positions have at their heart a focus on getting broadband services to as many ILEC and CLEC customers as possible while still remaining profitable. The remainder of the comments below will not attempt to construct tight legal arguments to justify a course of action. That will be left to other commenting parties. The comments below will be much more practical in nature and will focus on why carriers do or do not deploy broadband facilities, how Commission proposals could negatively effect broadband competition, deployment and innovation and what can be done to limit the unwanted or unintended consequences of future policy decisions.

II. Deployment of Broadband Facilities

Prior to developing a coherent wireline broadband policy one needs a clear understanding of 1) why ILECs (and CLECs) deploy broadband-capable facilities and 2) why the deployment of facilities is lagging behind in some areas.

A. Why broadband capable facilities are deployed

Three factors significantly effect the timing and geographic coverage of broadband facilities deployment, customer demand, availability of funds and competitive pressures. Customer demand for new products and services such as DSL drives deployment decisions more than any other single factor. As new technologies, features or functions emerge, technologically sophisticated customers will voice their desire for carriers to offer new services. As more customers come forward, especially high revenue business customers, carriers begin to feel the need to address their requests. At some point, the requests grow to a critical mass that prompts action from a carrier. In urban and suburban areas, this critical mass may be reached very quickly. In rural areas it may take a much longer time to justify expenditures, as has been the case with DSL. If the technology is important enough it may be in the public interest for regulatory or governmental agencies to provide incentives to further deployment. In such cases, a targeted initiative, not a wholesale reconstruction of the regulatory system, is likely to yield the most benefits with the least disruption.

Additionally, unless carriers have access to capital to fund equipment purchases, no facilities will be built regardless of demand. For all LECs, but especially small and rural ILECs, the amount of funds available for upgrading systems is extremely limited, yet according to a recent study by NECA, the cost of deploying broadband-capable facilities ubiquitously is astounding.[5] Therefore, as with every investment decision, carriers must perform a cost-benefit analysis which includes weighing the return on a

broadband investment against the potential return associated with, for example, adding new calling features or expanding dial-up service. Other alternative uses of scarce resources include accelerated or normal plant maintenance to reduce costs and switch upgrades. Carriers may also be required to comply with mandates such as CALEA or LNP/Number Pooling, further draining funds. Based on all of these factors, only in areas where a clear investment return can be forecast will carriers deploy broadband capable facilities. The Commission should bear in mind that every initiative, no matter how well intentioned, will inevitably drain funds from broadband deployment.

Competitive pressures also significantly impact broadband deployment decisions, and in this area, the Commission may have the greatest ability to influence carrier decisions. If CLECs, cable companies, wireless carriers and satellite providers offer broadband services to ILEC customers, those ILECs can choose to either meet those customers' needs or lose them to competition. Actual or expected competition from these providers can do amazing things to change an ILEC's analysis as to where and when to upgrade facilities. In distributing the finite pot of money that can be allocated for broadband, competitive pressures can make the difference in the decision-making process. In a situation where a carrier must decide where to deploy services and the choice is between two geographic areas with and without competition, the services will be deployed in the area with competition in every instance. Customers obviously benefit from competition from any and all sources through the expansion of available broadband products and services, price reductions (or at least caps on rising prices) and increased innovation by the carriers involved. By continuing to mandate the availability of

[5] NECA has estimated that it would cost approximately $10.9 billion to upgrade the lines of rural carriers to make them broadband capable. *NECA Rural Broadband Cost Study: Summary of Results*, page 2, June 21,

broadband UNEs, including high capacity loops, and by clarifying and enforcing its unbundling rules, the Commission can ensure that current competitive alternatives are retained and further competition is stimulated.

B. Why broadband facilities deployment lags in some areas

The reasons broadband deployment may be lagging in certain areas are just as straightforward as the reasons why deployment occurs. Above all else, currently there is a lack of customer demand for broadband products. The experience of the Joint Commenters provides clear evidence of that. For example, in the rural ILEC territories of TDS Telecom, DSL penetration rates have ranged from less than 1% to 7.5%, with an average of just over 2%. In the more urban territories in which their CLECs operate, penetration rates have reached over 10% in some areas. Such evidence clearly shows that broadband capabilities can be profitably deployed in many locations even in the face of intra- and inter-modal competition. However, it is just as clear that it makes no sense for carriers to upgrade facilities outside of large cities, suburbs or somewhat concentrated small towns where there is an insufficient demand and customer base to generate adequate revenue streams. Without adequate demand, carriers cannot and should not expend scarce resources to offer broadband services.

Market entrants are still waiting for that "killer app" that will sufficiently stimulate demand. Current Internet applications such as reading email, on-line shopping, streaming video or playing on-line games are not compelling reasons for most consumers and businesses to spend the additional money to purchase broadband access service. Deregulation or regulatory forbearance is not going to stimulate customer demand for

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2000. http://www.neca.org/broadban.pdf

broadband to levels that would justify speedier deployment. The only thing that upsets this equation is the threat of competition. Competitive pressures help accelerate deployment into areas where profit margins may be slim but a response is necessary for defensive purposes.

The flip side of the coin is supply/costs. Here is where the Commission is attempting to have an impact. Again, it is helpful to look at the results of NECA's *Rural Broadband Cost Study*. While that study did not include non-pooling carriers such as the RBOCs, it seems reasonable to assume that the rural RBOC areas in need of facilities upgrades would be somewhat similar to the rural areas of small carriers in need of upgrades.[6] According to NECA, of the 35% of rural lines that are not broadband capable, about half of those lines are outside of the Central Dial Office Service Area (CDOSA), greater than 18,000 feet from the central office, or are in Isolated Areas.[7] This increases the average cost of upgrading lines significantly to anywhere from $4,121 per line outside of the CDOSA, to $9,328 per line in Isolated Areas.[8] Unbundling obligations are not slowing the roll out of broadband, high costs are. As such, deregulation or regulatory forbearance will do absolutely nothing to speed broadband deployment in these areas.

Some large carriers may argue that regulatory requirements raise the cost of deploying broadband in areas that would otherwise be profitable to serve. Furthermore, they may further claim that TELRIC pricing forces them to price unbundled broadband elements below cost. These arguments are dubious at best. Conceding, arguendo, their validity, higher costs and levels of risk can be accounted for in TELRIC pricing models.

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[6] For example, in its Third Section 706 Report, FCC data for 2001 showed that 64% of all ILEC lines are DSL capable, while the *NECA Rural Broadband Cost Sudy* estimates that 65% of rural LEC lines are capable of providing broadband service.

[7] *NECA Rural Broadband Cost Study*, page 4.

Cost of capital inputs can be raised to deal with market uncertainty related to broadband deployment, thus increasing prices for these elements. Additionally, it is in areas outside the urban core where the cost of deploying broadband is likely to be higher, and thus broadband capabilities may be lacking. The Commission's requirement to geographically deaverage UNEs was designed for just such a problem. In higher cost areas, prices for all UNEs, including broadband related UNEs will be higher to account for less customer density, longer loops lengths and differing network design. Significant effort by the Commission was put into creating a system to deal with this exact issue and the Commission should not consider abandoning current policy because certain carriers have not received favorable rulings in state proceedings.

III. Proposed FCC Framework

The FCC's *Broadband NPRM* starts out with clear and largely uncontroversial guidelines 1) that broadband policies should encourage ubiquitous availability, 2) that policies should include all platforms while not embracing one platform too quickly, 3) that minimal regulation should apply to limit discriminatory and anti-competitive actions, and 4) that consistent regulations be applied across platforms, to the extent possible.[9] However, the *Broadband NPRM* takes a dramatic turn in the very next paragraph by proposing a system that is based on the services provided to the end user and not the facilities used to provide that service. Such a scheme seems to sidestep the fact that broadband services are and will be provided over the same network and facilities as voice services by the owner of the facilities. No separate "broadband network" exists.

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[8] *NECA Rural Broadband Cost Study*, page 4.
[9] *Broadband NPRM* at paragraphs 3-6.

Wireline facilities capable of providing high speed access to the Internet come into being as either incremental upgrades that supplement the current POTS network or complete replacements for current POTS networks that will be used to carry all types of traffic. A regulatory framework that attempts to apply differing levels of regulation for voice and broadband services carried over the same facilities will be unworkable, will create incentives for regulatory gaming and will not promote additional deployment of broadband facilities.

A. Retail Broadband Services

The Joint Commenters do agree with the Commission with respect to the categorization of broadband Internet access services as an information service regardless of who provides the underlying transmission component of the service. These retail service offerings should have minimal regulation. This will allow for innovation in pricing and bundling of service offerings and create as much parity as possible across all platforms when offering services to prospective end users.

B. Wholesale Broadband Services

With respect to the transmission component of wireline broadband Internet access, the Joint Commenters urge the Commission to reevaluate their tentative conclusion that categorizes this component as "telecommunications" and not as a "telecommunications service" when part of a bundled offering.

1. Potential Gaming of the Regulatory System

Many aspects of the Commission's proposed regulatory framework would encourage carriers to attempt to manipulate the system for their benefit at the expense of potential competitors. First, the Commission's supposition that the transmission component of broadband Internet access is somehow different when provided as a bundled offering to an end user than when provided as a stand alone service offered on a wholesale basis is erroneous. The service provided and the facilities used are exactly the same whether provisioned through an affiliated or unaffiliated ISP. Differing regulatory treatment would not only allow but would encourage ILECs to close their networks to competing ISPs and CLECs in order to gain additional regulatory freedom and would be inherently discriminatory. Any rational company would take the path leading to the least amount of regulation while competition would clearly suffer in this context.

Second, by allowing the service provided over a facility to determine the regulatory requirements associated with the facility, the Commission will leave open for interpretation far too many aspects of the framework, and therefore invite further gaming. Since ILECs and CLECs can and do provide broadband Internet access over a variety of facilities throughout the network, who will make the determination that a specific facility is covered by deregulatory action? All types of fiber, dark, lit, loop and transport, can support broadband Internet access as can T-1s, conditioned copper loops and loops that contain copper and fiber components in a DLC architecture. Each of these facilities also carry voice traffic. How can the Commission expect to craft regulations that effectively draw lines adequately covering every facility and every location of a totally integrated voice and data network? The Joint Commenters do not believe the Commission can or should make such an attempt.

Third, the Commission raises the possibility of differing regulatory treatment for "old fiber" and "new fiber." This scheme is just as unworkable and will allow for discriminatory gaming. Again, this proposal will allow the owner of the facilities to determine the level of regulation. If new facilities are subject to less or no regulation, LECs could easily upgrade or replace facilities for the sole purpose of effectively ending competitive access in specific geographic locations.

Claims that retaining access to old copper facilities or allowing collocation at remote terminals (RTs) would be adequate for competitors have been discredited in various regulatory proceedings. The Public Service Commission of Wisconsin recently addressed the issue of access to Next Generation DLC broadband architecture in its investigation into Ameritech's unbundled network elements.[10] The PSCW found that "[u]sing all copper loop, CLECs will experience higher costs, lower and less consistent levels of quality, have less ubiquitous access to customers, and provide more troublesome operational issues."[11] Likewise, collocation at RTs was seen as unworkable due to high costs, time delays and space limitations, among other things.[12] The Illinois Commerce Commission ruled similarly and found that without adequate CLEC access to all components of this architecture that the ILEC "would in all likelihood gain such a significant market advantage that it would become a monopoly provider of advanced services."[13]

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[10] Final Decision, *Investigation Into Ameritech Wisconsin's Unbundled Network Elements*, Docket No. 6720-TI-161, March 22, 2002, ("*PSCW UNE Order*").
[11] *PSCW UNE Order*, paragraph 75.
[12] *PSCW UNE Order*, paragraph 67.
[13] Arbitration Decision on Rehearing, *Petition for Arbitration Pursuant to Section 252(b) of the Telecommunications Act of 1996*, Consolidated Cases 00-0312 and 00-0313, February 15, 2001, ("*ICC Order*"), page 35.

By categorizing the transmission component of broadband Internet access services as a telecommunications service regardless of who sells the retail product to the end user (and therefore retaining related unbundling obligations), the Commission can minimize regulatory gaming and promote greater competition in the market without stifling further broadband deployment. The Commission will also avoid becoming embroiled in an endless stream of complaints as carriers dispute rules that will leave far too much room for interpretation. By asserting federal jurisdiction over broadband facilities, state regulators will be unable or unwilling to intervene and conflicts will need to be resolved by the Commission alone.

2. Rural Broadband Deployment

An additional benefit of classifying broadband transmission service as a telecommunications service is that it allows small and rural carriers to continue to tariff services and recover costs through the NECA pooling process. As pointed out above, significant portions of the networks of rural carriers are likely to be extremely costly to upgrade. For many small companies, pooling the costs and risks associated with these expensive upgrades is the best, and in some cases the only, way to achieve wide geographic coverage. Without classification as a telecommunications service it appears this tariffing and pooling could not occur.[14] Pulling the plug on the pooling system would cause serious harm to the prospects of expanding broadband deployment in the areas that are most lagging at this time. Deregulation will do absolutely nothing to help NECA carriers overcome high deployment costs.

[14] It is the understanding of the Joint Commenters that NECA will be filing comments in this proceeding detailing the potential impact of the proposed regulations on the tariffing and pooling process.

The Commission should also consider the fact that millions of rural access lines have already been, or will soon be sold by the largest LECs to small carriers or entrepreneurs. These are the types of lines that are least likely to already be broadband capable. While the RBOCs have been the strongest advocates for broadband deregulation, the divestiture of their rural properties will likely eliminate large sections of their network that still require upgrades and solve many of their problems for them. Unfortunately, deregulation will not make it any easier for the new owners of these properties to upgrade the facilities. By categorizing the transmission component of broadband Internet access services as a telecommunications service, the Commission can retain the NECA tariffing and pooling systems that have been effectively promoting the deployment of broadband facilities in rural areas. These are the areas where deployment can be difficult to economically justify and therefore would most likely lag behind.

3. Universal Service Considerations

The Commission raises important universal service issues in the *Broadband NPRM* and asks very valid questions about the stability of the fund in the face of the growth of broadband and migration of services.[15] The Joint Commenters believe that the most straightforward and defensible way for the Commission to ensure the stability of the fund and its contribution base is by classifying the transmission component of broadband Internet access as a telecommunications service. Regardless of what the Commission determines to be the appropriate contribution methodology in its concurrent universal service proceeding, this classification would cover all wireline broadband service providers since every broadband service offering would have an interstate

telecommunications component, thus clearly establishing the Commission's authority to impose contribution requirements. Looking to permissive authority or other avenues in the 1996 Act to justify Commission contribution requirements is an invitation to legal challenges that could cause implementation delays and further uncertainty.

Establishing that all wireline broadband services have transmission components subject to universal service contribution requirements would also help deal with the migration of voice traffic to broadband platforms, which is happening today and will only grow. Since all broadband providers would already be subject to some contribution requirement, adjustments to per line assessments or revenue percentages could quickly and easily be made as migration occurs.

A secondary universal service benefit that results from the telecommunications services classification is that it leaves the door open for future inclusion of broadband capable facilities in the definition of universal services eligible for funding. While the Joint Commenters are not advocating for that change in the definition of universal service at this time, ubiquitous broadband access may one day become as critical to the well being and prosperity of individual citizens and communities as access to voice services is today. One would think that it would be much more difficult to justify including an information service in the definition of universal service, thus making it eligible for funding. Classification as a telecommunications service avoids as least one potential problem down the road.

Finally, the Commission rightly raises questions about the allocation of shared costs,[16] the subsidization of competitive services and the use of universal service funds to

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[15] *Broadband NPRM* at paragraphs 81-82.
[16] *Broadband NPRM* at paragraph 63.

recover costs associated with competitive services.[17] Because so many facilities are used for the provision of both voice (qualifying for USF) and broadband/data, it is conceivable that carriers may need to completely reevaluate the allocation of costs for any facility carrying deregulated broadband traffic. Since this traffic will likely go over fiber and high capacity loops, pass through DLCs, be transported over SONET rings and split off at switches, every piece of the network is touched by this traffic. If the cost of a portion of all of these facilities is now considered a competitive interstate information service, will costs associated with the traffic and facilities need to be directly assigned to the interstate jurisdiction, thus precluding state cost recovery? These potential consequences would need to be addressed, especially for non-price cap carriers. By categorizing the transmission component of broadband Internet access services as a telecommunications service, the Commission can help ensure the stability of the universal service fund and its contribution base and eliminate the need to reevaluate the complex system of allocating the costs associated with shared facilities.

IV. Summary and Recommendations

Consistent with the concerns voiced above, the Joint Commenters urge the Commission to take the following steps to encourage additional deployment, competition and innovation in the broadband services market.

A. Categorize the retail provision of wireline broadband Internet access as an information service subject to very limited regulatory oversight. This would allow wireline broadband providers flexibility in pricing and bundling broadband service offerings to end users.

[17] *Broadband NPRM* at paragraph 83.

B. Classify the transmission component of wireline broadband Internet access a telecommunications service regardless of whether it is part of a bundled offering to the end user or wholesale offering to a competing CLEC/ISP. This will avoid negative competitive, cost recovery and universal service consequences.

C. Promote open networks wherever and whenever possible through regulatory proceedings, merger reviews, conditional grants of forbearance or the establishment of incentives, but recognize that wireline providers continue to have a statutory obligation to keep their networks open.

D. Take any action necessary to reduce the costs and delays associated with obtaining use of municipal, state or federal rights of way.

E. Seek ways to promote broadband deployment in areas specifically identified as lagging behind, especially rural areas. The FCC's current proposal does not effectively further this goal. While the FCC may have few tools to accomplish this objective, it can redouble its efforts to collect data to identify underserved areas and forward that data and recommendations to state and federal policymakers.

F. Ensure that government-controlled broadband networks are held to the same standards as all other carriers and do not use inherent advantages, such as access to rights of way, funding projects through the tax base or discount borrowing, in anti-competitive ways.

Simply deregulating wireline broadband Internet access services will not create any new incentives for carriers to upgrade or replace facilities to make them broadband

capable. In fact, the Commission's proposal in its current form could actually slow the deployment of broadband-capable facilities where they are already lagging behind, in rural communities. The Joint Commenters request that the Commission rethink its proposed broadband regulation framework and establish a balanced regulatory approach that will benefit end users by promoting the deployment of facilities, the expansion of competition and development of innovative products and services.

Respectfully Submitted,

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